



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 30, 2021

BY ECF

The Honorable George B. Daniels
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: ***United States v. Willie Evans et al., S5 20 Cr. 57 (GBD)***

Dear Judge Daniels:

The Government writes, with the consent of all defense counsel, to respectfully request an adjournment of the January 5, 2022 status conference. The Government has been in ongoing plea negotiations with many of the defendants, and the Government anticipates reaching additional plea agreements with some of the defendants in the coming months. Many of the defendants have adjourned their motions deadline and the Government expects that any motions will be fully briefed by March 2022. Accordingly, the parties jointly request that the upcoming conference be adjourned until after any defense motions are fully briefed. The requested adjournment will allow defendants additional time to review the discovery and to consult with their counsel concerning potential motions or pretrial dispositions.

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The Government additionally requests, with the consent of all defense counsel, that the Court exclude the time between January 5, 2022 and the next conference date from calculation under the Speedy Trial Act. Such an exclusion would allow the defendants and defense counsel to review discovery and contemplate bringing any motions, it would give the parties an opportunity to discuss the possibility of any pretrial dispositions, and it would be in the interest of justice. *See* 18 U.S.C. § 3161.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: s/

Rushmi Bhaskaran
Peter J. Davis
Assistant United States Attorneys
Southern District of New York

cc: All Counsel of Record (by ECF)